## **EXHIBIT 7**

## REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

From: <u>Maxwell Pritt</u>
To: <u>Jeff Nardinelli</u>

Cc: QE-Waymo; UberWaymoMoFoAttorneys; John Cooper (JCooper@fbm.com); DG-

<u>GPOttoTruckingWaymo@goodwinlaw.com;</u> <u>BSF\_EXTERNAL\_UberWaymoLit;</u> <u>Matthew Cate</u>

Subject: RE: Waymo v. Uber - Waymo PROD061-063

Date: Wednesday, September 13, 2017 3:19:32 PM

Hi Jeff,

Saturday's Waymo PROD061-063 appear to contain hundreds of documents (conservatively, around 800 out of 1,257) that aren't related to the subjects of any of the recent discovery orders. Just a few examples include:

- 1. WAYMO-UBER-00094886- 894, Google's Official Data Classification Guidelines as of 12/10/2013
- 2. WAYMO-UBER-00095020-951, Google's "The Company Bonus Plan"
- 3. WAYMO-UBER-00094177-179, 02-19-2016 Email between Google employees and
- 4. WAYMO-UBER-00091492-500, email from Fidrick to Droz and Levandowski re:
- 5. WAYMO-UBER-00093563-564, email from Tanya Sumang to others at Google including Kshirsagar re: "[Laser Dev] GBR Update 11/13-EOB"

Please let us know no later than tomorrow morning why these documents were included in Saturday's production, weeks after the close of discovery and after the deadline the parties negotiated for MILs. Please also let us know when to expect the additional production and accompanying privilege log referenced in your email below.

Thanks, Max

**From:** Jeff Nardinelli [mailto:jeffnardinelli@quinnemanuel.com]

Sent: Monday, September 11, 2017 5:58 PM

**To:** Maxwell Pritt **Cc:** QE-Waymo

Subject: RE: Waymo v. Uber - Waymo PROD060

Actually PROD062 is also M&A related. On an earlier separate thread I told you that we'd had to pull back three documents because they contained personal information. PROD062 is those three documents plus their families, but with appropriate redactions covering private/financial information.

**From:** Maxwell Pritt [mailto:mpritt@BSFLLP.com] **Sent:** Monday, September 11, 2017 5:02 PM

**To:** Jeff Nardinelli < jeffnardinelli@quinnemanuel.com>

**Cc:** QE-Waymo <qewaymo@quinnemanuel.com> **Subject:** RE: Waymo v. Uber - Waymo PROD060

Thanks, Jeff. What is PROD062 then?

From: Jeff Nardinelli [mailto:ieffnardinelli@guinnemanuel.com]

Sent: Monday, September 11, 2017 2:35 PM

To: Maxwell Pritt; UberWaymoMoFoAttorneys; <u>DG-GPOttoTruckingWaymo@goodwinlaw.com</u>;

BSF\_EXTERNAL\_UberWaymoLit; John Cooper (<u>JCooper@fbm.com</u>); Matthew Cate

Cc: QE-Waymo

Subject: RE: Waymo v. Uber - Waymo PROD060

Max.

We produced additional M&A-related documents on Saturday via PROD061 and PROD063. We are reviewing a final set of responsive documents and will produce them as soon as we are ready. Attached please find our privilege log corresponding to PROD060 through PROD063.

Thanks, Jeff

**From:** Maxwell Pritt [<u>mailto:mpritt@BSFLLP.com</u>]

Sent: Sunday, September 10, 2017 7:24 PM

**To:** Jeff Nardinelli < <u>jeffnardinelli@quinnemanuel.com</u>>; UberWaymoMoFoAttorneys < <u>UberWaymoMoFoAttorneys@mofo.com</u>>; <u>DG-GPOttoTruckingWaymo@goodwinlaw.com</u>; BSF\_EXTERNAL\_UberWaymoLit < <u>BSF\_EXTERNAL\_UberWaymoLit@BSFLLP.com</u>>; John Cooper (<u>JCooper@fbm.com</u>) < <u>JCooper@fbm.com</u>>; Matthew Cate < <u>MCate@fbm.com</u>>

**Cc:** QE-Waymo <<u>qewaymo@quinnemanuel.com</u>> **Subject:** RE: Waymo v. Uber - Waymo PROD060

Hi Jeff, please let me know about the issues below when you get a chance. Thank you.

Best, Max

From: Maxwell Pritt

Sent: Saturday, September 09, 2017 1:32 PM

**To:** 'Jeff Nardinelli'; UberWaymoMoFoAttorneys; <u>DG-GPOttoTruckingWaymo@goodwinlaw.com</u>;

BSF\_EXTERNAL\_UberWaymoLit; John Cooper (JCooper@fbm.com); Matthew Cate

Cc: QE-Waymo

Subject: RE: Waymo v. Uber - Waymo PROD060

Hi Jeff.

Please let us know if Thursday's production was the complete production of documents responsive to RFPs 170, 172, and 173. Also, please let us know when Waymo will produce the privilege log associated with this production. Thanks very much.

Best, Max

From: Jeff Nardinelli [mailto:jeffnardinelli@quinnemanuel.com]

Sent: Thursday, September 07, 2017 3:33 PM

**To:** UberWaymoMoFoAttorneys; <u>DG-GPOttoTruckingWaymo@goodwinlaw.com</u>; BSF\_EXTERNAL\_UberWaymoLit; John Cooper (<u>JCooper@fbm.com</u>); Matthew Cate

Cc: QE-Waymo

Subject: Waymo v. Uber - Waymo PROD060

Counsel,

Please find at the link below Waymo production PROD060.

https://sendfile.guinnemanuel.com/pkg?token=f9d043bc-3cd5-4e5c-b320-0097ae60e65d

I'll send the password separately.

## Jeff Nardinelli

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